



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

271 Cadman Plaza East
Brooklyn, New York 11201

April 2, 2020

By Hand and ECF

The Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Juan Ángel Napout
Criminal Docket No. 15-252 (S-2) (PKC) (RML)

Dear Judge Chen:

The government respectfully writes to request a briefing schedule in connection with defendant Juan Angel Napout's Motion for Sentence Modification filed on April 1, 2020. ECF Dkt. No. 1328. In his 21-page motion, Napout seeks multiple alternative forms of relief, including a sentence reduction to time served, modification of his sentence to allow him to serve part of it at home, and release pending appeal. In order to be able to address each of the arguments, the government respectfully requests that it be permitted to file its opposition brief by April 10, 2020.

Respectfully submitted,

RICHARD P. DONOGHUE
United States Attorney

By: /s/
Samuel P. Nitze
M. Kristin Mace
Keith D. Edelman
Assistant U.S. Attorneys
(718) 254-7000

cc: Counsel of record (by ECF)
Clerk of Court (PKC) (by ECF)